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November 21, 2024

VIA ECF

Honorable Jennifer L. Rochon
 United States District Court
 Southern District of New York
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street
 New York, NY 10007-1312

Re: Cengage Learning, Inc. et al. v. Google LLC, No. 1:24-cv-04274-JLR-BCM
Consent Request for Adjournment and Rescheduling of Conference

Dear Judge Rochon:

We represent Defendant Google LLC (“Google”) in the above-captioned matter. On November 19, 2024, the Court scheduled a pre-motion discovery conference on November 26, 2024, at 10:00 a.m. Dkt. No. 51. Counsel for Google has long-standing travel plans in connection with the Thanksgiving holiday that conflict with the date and time set for the conference. Pursuant to Rule 1.F. of this Court’s Individual Rules of Practice in Civil Cases, we therefore respectfully request that the Court adjourn and reschedule the conference. We have conferred with Plaintiffs’ counsel, who consent to this request with the remarks that “they are available to proceed with the conference on November 26, 2024 and are concerned about delay in resolving the disputed discovery issue, but nevertheless consent to Google’s counsel’s request as a matter of professional courtesy.”

The parties are available on December 2, 3, and 4, if any of those dates are convenient for the Court.

There have been no prior requests to extend the date of this pre-motion discovery conference, and the request will not affect any deadlines in the Case Management Plan and Scheduling Order, Dkt. No. 34.

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We thank the Court for its consideration of this request.

Sincerely,

/s/ Sarah A. Tomkowiak

Sarah A. Tomkowiak
of LATHAM & WATKINS LLP

cc: All counsel of record (via ECF)